

**Exhibit 1**

**Supplemental Priore Declaration**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	)	Case No. 12-12020 (MG)
	)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,	)	Chapter 11
	)	
Debtors.	)	Jointly Administered
_____	)	

**SUPPLEMENTAL DECLARATION OF KATHY PRIORE IN SUPPORT OF REPLY IN  
SUPPORT OF OBJECTION OF THE RESCAP BORROWER CLAIMS TRUST TO  
CLAIM NUMBERS 5610 AND 5612 FILED BY RICHARD D. RODE**

I, Kathy Priore, hereby declare as follows:

**A. Declarant's Background and Qualifications**

1. I serve as Associate Counsel for The ResCap Liquidating Trust (the "Liquidating Trust"), established pursuant to the terms of the *Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al., and the Official Committee of Unsecured Creditors* [Docket No. 6030] confirmed in the above-captioned chapter 11 cases (the "Chapter 11 Cases"). During the Chapter 11 Cases, I served as Associate Counsel in the legal department at Residential Capital, LLC ("ResCap"), a limited liability company organized under the laws of the state of Delaware and the parent of the other debtors in the above-captioned Chapter 11 Cases (collectively, the "Debtors"). I joined ResCap on May 1, 2008 as in-house litigation counsel. Prior to my in-house litigation counsel position, I held various roles within the legal department at ResCap.

2. In my role as Associate Counsel at ResCap, I was responsible for the management of residential mortgage-related litigation. In connection with ResCap's chapter 11 filing, I also assisted the Debtors and their professional advisors in connection with the

administration of the Chapter 11 Cases, including the borrower litigation matters pending before this Court. In my current position as Associate Counsel to the Liquidating Trust, among my other duties, I continue to assist the Liquidating Trust and Borrower Claims Trust (the “Borrower Trust”) in connection with the claims reconciliation process.<sup>1</sup> I am authorized to submit this supplemental declaration with respect to the *Reply In Support Of Objection Of The ResCap Borrower Claims Trust To Claim Numbers 5610 And 5612 Filed By Richard D. Rode* (the “Reply”).<sup>2</sup>

3. Except as otherwise indicated, all facts set forth in this Declaration are based upon my familiarity with the Debtors’ Books and Records, information learned from my review of relevant documents, and information I received through my discussions with other former members of the Debtors’ management or other former employees of the Debtors and/or the Liquidating Trust’s or Borrower Trust’s professionals and consultants. If I were called upon to testify, I could and would testify competently to the facts set forth in the Objection on that basis.

4. At the request of the Borrower Trust, the Liquidating Trust’s professionals conducted a review of the Debtors’ Books and Records covering the period from March 11, 2010 to April 10, 2010. That review failed to locate a written communication from Rode or his counsel that requests the name and address of the original creditor under the Note.

5. Prior to filing the Objection, the Liquidating Trust was informed that Ocwen was seeking to foreclose on the Rode Loan. Based on subsequent correspondence with

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<sup>1</sup> The ResCap Liquidating Trust and the ResCap Borrower Trust are parties to an Access and Cooperation Agreement, dated as December 17, 2013, which, among other things, provides the Borrower Trust with access to the Books and Records held by the Liquidating Trust and the Liquidating Trust’s personnel to assist the Borrower Trust in performing its obligations.

<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Reply.

Ocwen, the Liquidating Trust understands that Ocwen stopped foreclosure with respect to the Rode Loan in November 2014.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 12, 2015

/s/ Kathy Priore  
Kathy Priore  
Associate Counsel for  
The ResCap Liquidating Trust